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and Debtors in Possession

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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	:
<b>In re</b>	:
	:
<b>MOTORS LIQUIDATION COMPANY, <i>et al.</i>,</b>	:
<b>f/k/a General Motors Corp., <i>et al.</i></b>	:
	:
<b>Debtors.</b>	:
	:
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**Chapter 11 Case No.**  
**09-50026 (REG)**  
**(Jointly Administered)**

**MOTORS LIQUIDATION COMPANY *ET AL.*'S (f/k/a GENERAL MOTORS  
CORPORATION *ET AL.*) STATEMENT OF ISSUE PRESENTED ON APPEAL  
AND COUNTERDESIGNATION OF ADDITIONAL ITEMS  
TO BE INCLUDED IN THE RECORD ON APPEAL IN CONNECTION  
WITH THE APPEAL OF WALTER J. LAWRENCE**

Pursuant to Rule 8006 of the Federal Rules of Bankruptcy Procedure,  
Motors Liquidation Company (f/k/a General Motors Corporation) and its affiliated  
debtors, as debtors (collectively, the "**Debtors**"), submit the following statement of issue  
presented on appeal and counterdesignation of additional items to be included in the  
record in connection with the appeal of Walter J. Lawrence ("**Lawrence**") from the order  
of the United States Bankruptcy Court for the Southern District of New York (the

“**Bankruptcy Court**”) (Robert E. Gerber, J.) denying Lawrence’s motion for relief from the automatic stay, entered on November 24, 2009 (the “**Order**”) [Docket No. 4524].<sup>1</sup>

**STATEMENT OF ISSUE ON APPEAL**

1. Has Appellant met his burden of establishing that the Bankruptcy Court abused its discretion in granting the Order denying his motion for relief from the automatic stay?

**COUNTERDESIGNATION OF RECORD**

<b>Designation Number</b>	<b>Date of Filing</b>	<b>Docket Number</b>	<b>Description</b>
1	6/01/2009	21	Affidavit of Frederick A. Henderson Pursuant to Local Bankruptcy Rule 1007-2
2	6/27/2009	2649	Amended and Restated Master Sale & Purchase Agreement and Certain Exhibits and Schedules Thereto
3	10/05/2009	4202	Motion for Relief from Stay filed by Walter J. Lawrence
4	10/30/2009	4327	Debtors’ Opposition to the Motion of Walter J. Lawrence for Entry of an Order Granting Relief from the Automatic Stay

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<sup>1</sup> This Counterdesignation designates certain items that have been designated in Appellant’s Designation of Items to be Included in the Record on Appeal (“**Lawrence’s Designation**”), to avoid any confusion regarding which items are included in the record on appeal because Lawrence’s Designation failed to provide a date and/or docket number with respect to such items. The Debtors reserve the right to amend this Counterdesignation of Additional Items to be Included in the Record on Appeal. For items designated, the designation includes all documents referenced within the particular document number, including, without limitation, all exhibits, attachments, declarations, and affidavits related thereto.

5	11/04/2009	4364	Movant's Sur-Reply to Debtors' Opposition to Motion of Movant for Entry of an Order Granting Relief from the Automatic Stay Pursuant to 11 U.S.C. § 362(d)(1)
6	11/06/2009	4416	Transcript Regarding Hearing Held on 11/5/09
7	11/24/2009	4524	Order Denying Motion of Walter J. Lawrence for Relief from Stay
8	12/03/2009	4618	Notice of Appeal filed by Walter J. Lawrence
9	6/1/2009 – 12/18/2009	N/A	Docket for <i>Motors Liquidation Company, et al. (f/k/a General Motors Corp. et al.)</i> , Ch. 11 Case No. 09-50026 (REG) for 6/1/2009 through 12/18/2009

Dated: December 18, 2009  
New York, New York

/s/ Stephen Karotkin

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